



## ARIZONA CORPORATION COMMISSION

## OPEN MEETING AGENDA ITEM

March 23, 2021

SANDRA D. KENNEDY

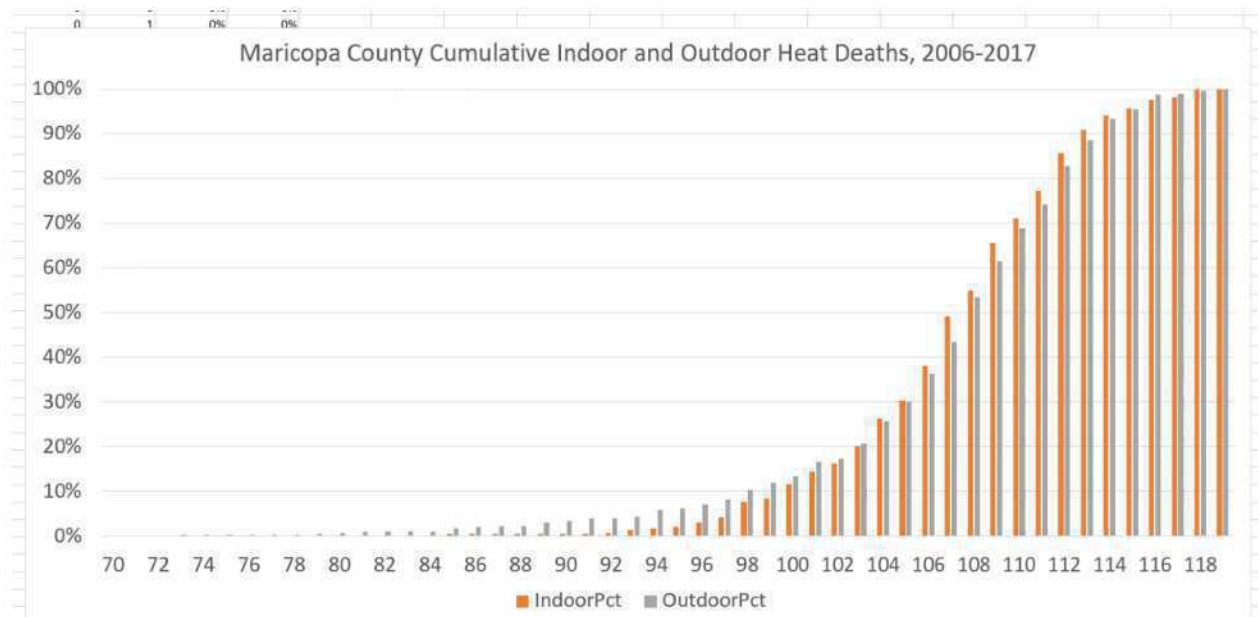
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IN THE MATTER OF PROPOSED MODIFICATIONS TO THE RULES REGARDING  
TERMINATION OF SERVICE. (DOCKET NO. RU-00000A-19-0132)

To my fellow Commissioners,

My Proposed Amendment 2 to the Termination of Service rulemaking docket aligns the proposed rules with the relevant public health information. I would like to take this opportunity to highlight the specific data I am relying upon:

Slide 6 of Dr. Sunenshine's January 30, 2020 workshop presentation shows the Cumulative Percentage of Indoor Heat Deaths by Temperature, 2006-2017. The chart shows that zero indoor deaths occurred in temperatures from 80 to 91 degrees. At 92 degrees 1 percent of indoor deaths occurred. At 95 degrees, 2 percent of indoor deaths occurred and at 100 degrees, 12 percent of indoor deaths occurred.



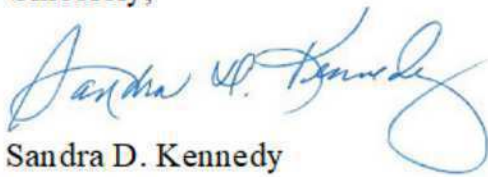
Temperature-based protections are also needed in addition to the seasonal moratorium. According to Dr. David Hondula at ASU:

“In terms of days at or above 105 outside of June 1-Oct 15, there were 90 such occurrences over the last 30 years (table below), and there was at least 1 such day in 23 of the last 30 years. So, it would be the "norm" for utilities to be implementing special protocol for suspending disconnections outside of the June 1-Oct 15 period. “(Email communication February 2, 2021 from Dr. Hondula.)

Ending Date	Number of Days Max Temperature >= 105 Oct 15 to Jun 1	Missing Count
1991-06-01	0	0
1992-06-01	1	0
1993-06-01	1	0
1994-06-01	1	0
1995-06-01	1	0
1996-06-01	3	0
1997-06-01	5	0
1998-06-01	0	0
1999-06-01	0	0
2000-06-01	6	0
2001-06-01	12	0
2002-06-01	4	0
2003-06-01	6	0
2004-06-01	1	0
2005-06-01	5	0
2006-06-01	5	0
2007-06-01	2	0
2008-06-01	3	0
2009-06-01	4	0
2010-06-01	0	0
2011-06-01	0	0
2012-06-01	8	0
2013-06-01	1	0
2014-06-01	4	0
2015-06-01	3	0
2016-06-01	0	0
2017-06-01	2	0
2018-06-01	4	0
2019-06-01	0	0
2020-06-01	8	0

If the Arizona Corporation Commission's goal in promulgating these rules is to prevent indoor deaths due to extreme heat, the threshold should be set to protect the most vulnerable people in these conditions, specifically the elderly and young children. The moratorium should be set at the temperature where the data shows zero indoor deaths have occurred. That temperature is between 86-91 degrees Fahrenheit, not 95 or 100 degrees. As we know, extreme heat can also occur outside of the summer season and protections for ratepayers should be in place for those events as well.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sandra D. Kennedy", with a large, stylized loop at the end.

Sandra D. Kennedy  
Commissioner